

The Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE

JULIE DALESSIO, an individual,
Plaintiff,

v.

UNIVERSITY OF WASHINGTON, a
Washington Public Corporation; ELIZA
SAUNDERS, Director of the Office of
Public Records, in her personal and official
capacity; ALISON SWENSON, Compliance
Analyst, in her personal capacity; PERRY
TAPPER, Public Records Compliance
Officer, in his personal capacity; ANDREW
PALMER, Compliance Analyst, in his
personal capacity; JOHN or JANES DOES
1-12, in his or her personal capacity,
Defendants.

No. 2:17-cv-00642-MJP

SUPPLEMENTAL DECLARATION
OF DEREK C. CHEN IN SUPPORT
OF DEFENDANTS' MOTION FOR A
PROTECTIVE ORDER

I, Derek C. Chen, declare as follows:

1. I am one of the attorneys representing the Defendant in this lawsuit. I make this declaration based upon my own personal knowledge, upon facts which are admissible in evidence. I am competent to testify to the matters set forth in this declaration.

2. The following exhibits are cited or relied upon in Defendants Reply Brief in support of Defendants' Motion for a Protective Order:

A. Attached as **Exhibit A** is a true and correct copy of an email string between Plaintiff's counsel Joe Thomas and myself regarding re-noting this motion and Plaintiff's Motion to Compel Responses to Plaintiff's First Set of Discovery

DECLARATION OF DEREK C. CHEN - 1
2:17-cv-00642-MJP

1010-00051/404161.docx

KEATING, BUCKLIN & MCCORMACK, INC., P.S.

ATTORNEYS AT LAW
801 SECOND AVENUE, SUITE 1210
SEATTLE, WASHINGTON 98104-1518
PHONE: (206) 623-8861
FAX: (206) 223-9423

1 Requests, including the 12:01 PM email Mr. Thomas omitted from *Dkt. 144-1*.
2 Both copies of the email string omit an unrelated email string regarding
3 supplemental initial disclosures that was originally attached to the bottom.
4

5 I declare under penalty of perjury under the laws of the State of Washington that the
6 foregoing is true and correct to the best of my knowledge.
7

8 DATED this 28th day of December, 2018, at Seattle, Washington.
9

10 /s/ Derek C. Chen
11 Derek C. Chen, WSBA #49723
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

CERTIFICATE OF SERVICE

I hereby certify that on December 28, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Attorneys for Plaintiff

Mr. Joseph Thomas
14625 SE 176th Street, Apt. N-101
Renton, WA 98058-8994
Telephone: (206) 390-8848
Email: joe@joethomas.org

DATED: December 28, 2018

/s/ Derek C. Chen

Derek C. Chen, WSBA #49723
Special Assistant Attorney General for
Defendant

801 Second Avenue, Suite 1210
Seattle, WA 98104-1518
Phone: (206) 623-8861
Fax: (206) 223-9423
Email: dchen@kbmlawyers.com